

PRESTON EASLEY, ESQ./Cal State Bar No. 108347
LAW OFFICES OF PRESTON EASLEY
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ATTORNEY FOR: Plaintiff
BERT MEYER

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

BERT MEYER,)	Civil No.: CV 04 00049 HG-BMK
)	(In Admiralty)
Plaintiff,)	
)	PLAINTIFF'S FIRST AMENDED
v.)	RESPONSE TO INTERROGATORY
)	NO. 11
MATSON NAVIGATION)	
COMPANY, INC.,)	
)	
Defendant.)	
_____)	


11. Describe accurately and fully in your own words exactly what occurred in the ten minutes prior to the occurrence, what occurred during the occurrence, and what occurred during the ten minutes after the occurrence including anything said by you or to you.

RESPONSE TO NO. 11:

I was unlocking a cone with a pole between rows 15 and 16. My right foot was on the catwalk and my left foot was on a padeye on the hatch lid. My left foot slipped and I lost my balance and fell. My left leg went into the gap between the catwalk and the inshore side of the

hatch lid and I was stuck. I was yelling for help for awhile, then Dan Farney helped me get out of the gap.

Dated: September 13, 2004


PRESTON EASLEY
Attorney for Plaintiff
BERT MEYER

VERIFICATION

STATE OF HAWAII

CITY & COUNTY OF HONOLULU

SS.


I am the Plaintiff

in the above entitled action or proceeding; I have read the foregoing Plaintiff's First
Amended Response to Interrogatory NO. 11

and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on Sept. 27, 2004 at Honolulu, Hawaii
(date) (place)


Signature
Bert Meyer

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

BERT MEYER,)	
)	
Plaintiff,)	Civil No.: CV 03-00696 SOM-BMK
)	(In Admiralty)
v.)	
)	CERTIFICATE OF SERVICE RE
MATSON NAVIGATION)	PLAINTIFF'S FIRST AMENDED
COMPANY, INC.,)	RESPONSE TO INTERROGATORY
)	NO. 11
)	
Defendant.)	
_____)	

CERTIFICATE OF SERVICE
RE PLAINTIFF'S FIRST AMENDED RESPONSE
TO INTERROGATORY NO. 11

I hereby certify that on this date copies of PLAINTIFF'S FIRST AMENDED RESPONSE
TO INTERROGATORY NO. 11 were duly served upon the following in the manner indicated
below, addressed as follows:

///

Mailed

Delivered

Via Facsimile

John R. Lacy, Esq.
GOODSILL ANDERSON
QUINN & STIFEL
Alii Place, Suite 1800
1099 Alakea Street
Honolulu, HI 96813

X

Attorneys for Defendants
MATSON NAVIGATION
COMPANY, INC.;
MATSON TERMINALS, INC.

X

Capt. Robert Riley
10 Arguello Circle
San Rafael, CA 94901

Kammy Kalili
P.O. Box 186
Hauula, HI 96717

X

Dated: September 27, 2004

By Patti Bannon
Patti Bannon